

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

In Re: JOHN PALMER ADAMS

**CHAPTER 7
NO. 08-13181 JDW**

MOTION TO REOPEN

COMES NOW, JOHN PALMER ADAMS, Debtor in the above styled and numbered cause, by and through undersigned counsel and moves this Court for an Order reopening the above captioned Chapter 7 Bankruptcy, respectfully showing unto the Court as follows:

1. That Debtor filed a Petition for relief under Chapter 7 of the Bankruptcy Code on the 12th day of August, 2008.
2. That on the 29th day of January, 2009, this Court entered an Order discharging the Debtor's Chapter 7 Bankruptcy.
3. That on the 29th day of January, 2009, this Court entered an Order closing the Debtor's Chapter 7 Bankruptcy.
4. The Debtor failed to list a potential asset as he was unaware that a claim existed. Although the Debtor believes that the claim had not arisen as of the date of the filing of his case, he acknowledges that the Chapter 7 Trustee is entitled to know of the potential claim so the issue of whether the asset belongs to the Debtor or is a part of the bankruptcy estate can be determined by this Court.
5. As a result of the above facts, the Debtor requests that the case be reopened to allow him to amend Schedule B.

WHEREFORE, Debtor prays that this Court will enter its Order reopening his Chapter 7 Bankruptcy so that the Debtor may amend Schedule B. Debtor prays for such other, further and general relief to which he may be entitled.

Respectfully Submitted,
JOHN PALMER ADAMS, Debtor

BY: /s/ Robert Gambrell
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Debtor; MSB #4409
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CERTIFICATE OF SERVICE

I, ROBERT GAMBRELL, Attorney for the above listed Debtor, do hereby certify that the following have been served electronically via ECF with a copy of the above Motion to Reopen to Henry G. Hobbs, Jr., Acting U. S. Trustee: USTPRegion05.JA. ECF@usdoj.gov, to Stephen P. Livingston, Sr., Chapter 7 Trustee: ms09@ecfcbis.com and to all parties that have entered an appearance requesting service via ECF.

This the 18th day of October, 2015.

/s/ Robert Gambrell
ROBERT GAMBRELL